

EXHIBIT 32 COVER SHEET

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR, Pro Se Plaintiff
3480 Pershing Ln
Washoe Valley, NV 89704
(775) 223-7899
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v.

WASHOE COUNTY, WASHOE COUNTY LIBRARY SYSTEM, JEFF SCOTT, THANH NGUYEN, JAMIE HEMINGWAY, BEATE WEINERT, STACY MCKENZIE, JONNICA BOWEN, BEN WEST, BUILD OUR CENTER, INC., STACEY SPAIN, ANGELINE PETERSON, CHRISTOPHER DANIELS, DEPUTIES ROTHKIN, SAPIDA, GOMEZ, and JOHN/JANE DOES 1-10,

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

EXHIBIT 32

Title: Video Recording of November 12, 2024, South Valleys Library Incident

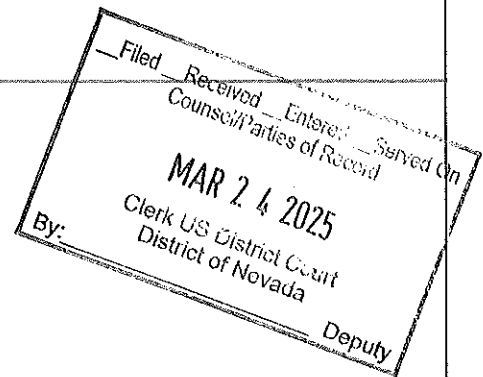
Date of Recording: November 12, 2024

Source: Original Video Evidence (AI-Generated Transcript: Exhibit 26)

Bates Number Range: Video 6

DESCRIPTION

PLEADING TITLE - 1



1 This video evidence documents the **unlawful detention** of Plaintiff, **Drew J. Ribar**, by Washoe
2 County Sheriff's deputies at the **South Valleys Library** on November 12, 2024. The video
3 supports claims of **Fourth Amendment violations**, **Fourteenth Amendment due process**
4 **violations**, and **First Amendment retaliation**, as well as the **collusion** between Washoe County
5 Library officials and law enforcement in suppressing Plaintiff's constitutionally protected
6 activities.
7

8 **KEY EVIDENCE IN VIDEO**

9 **1. Unlawful Detention Without Reasonable Suspicion**

- 12 ○ Deputies unlawfully detained Plaintiff without articulating a **valid legal reason**
13 for the stop.
- 14 ○ Plaintiff was prevented from leaving, constituting an **unlawful seizure** under
15 **Terry v. Ohio, 392 U.S. 1 (1968)**.

16 **2. Unconstitutional Demand for Identification**

- 18 ○ Deputies **Rothkin, Sapida, and Gomez** repeatedly demanded Plaintiff's
19 **identification** without reasonable suspicion of a crime.
- 20 ○ **NRS 171.123** does not allow ID demands without articulable suspicion, violating
21 Plaintiff's **Fourth Amendment rights** (See **Florida v. Royer, 460 U.S. 491**
22 **(1983)**).

23 **3. Lack of Prior Trespass Notice & Due Process Violation**

- 24 ○ Washoe County Library officials falsely claimed that Plaintiff was **already**
25 **trespassed**, yet **no notice had ever been issued**.
26
27

- Deputies acted on this **false claim** without verification, violating Plaintiff's **procedural due process** rights under the **Fourteenth Amendment**.

4. **First Amendment Retaliation**

- Plaintiff was **selectively targeted** for trespass enforcement, while others were allowed to remain in the same public space.
- Enforcement appears **retaliatory**, as Plaintiff was engaged in **protected activities**:
 - Filming
 - Questioning public policies
 - Gathering information for journalistic reporting

5. **Library Officials & Law Enforcement Collaboration**

- **Washoe County Library staff coordinated with deputies to restrict Plaintiff's access.**
- This collaboration **establishes a conspiracy** to suppress Plaintiff's speech and access to public spaces, further supporting **42 U.S.C. § 1983 claims**.

RELEVANCE TO CLAIMS IN AMENDED COMPLAINT

☒ **Fourth Amendment Violation**

- Deputies detained Plaintiff and demanded ID without lawful suspicion, making the stop unconstitutional.

1 ☒ **Fourteenth Amendment Due Process Violation**

- 2
- 3 • No formal trespass notice was issued, yet deputies falsely claimed one existed.
- 4 • The lack of a hearing or notice violated **procedural due process**.
- 5

6 ☒ **First Amendment Retaliation**

- 7
- 8 • Washoe County officials selectively **weaponized trespassing laws** against Plaintiff in
- 9 retaliation for his journalism and public records requests.
- 10 • The trespass action was a **pretext** to suppress speech and **limit access to public**
- 11 **information**.
- 12

13 ☒ **Refutes Defendants' Motion to Dismiss – Establishes State Actor Nexus**

- 14
- 15 • Library officials acted **jointly with law enforcement**, reinforcing state actor liability
- 16 under **42 U.S.C. § 1983** (See **Lugar v. Edmondson Oil Co.**, **457 U.S. 922 (1982)**).
- 17

18 ☒ **Supports Monell Liability Against Washoe County**

- 19
- 20 • Confirms a **systemic policy** of unconstitutional enforcement actions.
- 21 • Documents a **pattern** of retaliation against individuals questioning government policies.
- 22

23 **VIDEO FILE SUBMISSION NOTE:**

- 24
- 25 • The **video file** is submitted separately in compliance with **Northern District of Nevada**
- 26 **electronic filing procedures**.
- 27

CERTIFICATION OF EXHIBIT SUBMISSION

I, **Drew J. Ribar**, certify that this Exhibit 32 accurately represents the original video evidence recorded on November 12, 2024, and is submitted in compliance with **Federal Rules of Evidence 901**.

Dated: **March 17, 2025**

Respectfully Submitted,

/s/ **Drew J. Ribar**
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